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Hon. Philip M. Halpern
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

VIA ECF

Re: *Moody, et al. v. Empire Hotel Development, Inc. d/b/a Hyatt Place Poughkeepsie, et al.*
Case No. 7:20-cv-2203-PMH

Dear Judge Halpern:

This firm represents Defendants Hyatt Corporation, Hyatt Place Franchising, LLC, and Hyatt Hotels Corporation in the above-referenced matter. We write, joined by counsel for Empire Hotel Development, Inc. d/b/a Hyatt Place Poughkeepsie and Erfan Khan, and counsel for Plaintiffs, to request that Your Honor extend certain deadlines set forth in the Court's March 9, 2021 Order.


Specifically, the parties request that the Court extend the deadline for: (i) completing "fact discovery" from May 22, 2021, to June 25, 2021; (ii) completing "expert discovery" from July 7, 2021, to August 11, 2021; and (iii) completing all discovery from July 7, 2021 to August 11, 2021.

The parties have been diligently engaged in discovery, and have collectively exchanged hundreds of documents and taken numerous depositions, including the depositions of each of the seven Plaintiffs and multiple depositions of Defendants and non-parties. In the last two months, the parties attended nine depositions. The parties contemplate additional non-party depositions and are in the process of completing the exchange of post-deposition document demands and responses. While the parties have completed substantial discovery over the last two months, given the number of different parties involved and various challenges presented by the ongoing coronavirus pandemic, the parties anticipate that they will need approximately one additional month to complete fact discovery.

This is the parties' second request to extend the discovery deadlines set forth in the Court's Scheduling Order. Previously, by Order dated March 9, 2021, the Court granted the parties' initial joint request. All counsel of record agree to the extension and proposed dates.

Application granted. Discovery deadlines extended as follows: fact discovery is due 6/25/2021, expert discovery is due 8/11/2021, and all discovery is due 8/11/2021. The case management conference scheduled for 7/14/2021 is adjourned to 8/19/2021 at 10:15 a.m. and will be held via telephone. At the time of the case management conference, all parties shall call the following number: (888) 398-2342; access code 3456831.

SO ORDERED.



Philip M. Halpern
United States District Judge

Dated: White Plains, New York
May 19, 2021

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We thank the Court for its time and consideration.

Respectfully submitted,

/s/ Jennifer M. Horowitz

Jennifer M. Horowitz

cc All counsel of record (via ECF)